

July 24, 2019

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, District of Columbia 20554

*RE: Implementation of Section 621(a)(1) of the Cable Communications Policy Act of 1984 as Amended by the Cable Television Consumer Protection and Competition Act of 1992, Third Report and Order - MB Docket No. 05-311*

Dear Ms. Dortch,

We, the board of the Westwood Media Center (located in Westwood, MA) have serious concerns and disagreements with the FCC's proposed Third Report and Order requiring Local Franchising Authorities ("LFA's") to treat cable-related, in-kind contributions as franchise fees subject to the statutory five percent franchise fee cap.

This change would be devastating to our small community where residents have come to rely on the hyper local content we deliver. With the continue disappearance of local newspapers and reporters, community media centers are the last lifeline to local content. Our municipal meeting coverage is vital and allows for an active informed citizenry, especially for those who cannot attend in person.

Our Community Media Center operates a robust TV/Media education program in collaboration with Westwood Public Schools. We teach students the skills to be proficient in the age of modern media. Equally important, those students help provide high quality coverage of school sports, concerts and other educational programming to their peers, parents, extended family and other community members. We host numerous interns from local colleges who would otherwise not get hands on experience in media creation.

The loss of revenue caused by the Order will force municipalities to either divert resources away from core municipal and educational services to maintain existing PEG programming, suffer a dramatic reduction in the scope of PEG channels, or lose them altogether.

Since the adoption of the Second Further Notice of Proposed Rulemaking in September of 2018, an overwhelming and unified chorus of Massachusetts community media centers, state and local elected officials, and non-profit organizations representing an array of ethnic, religious, arts, cultural, economic development and educational stakeholders have responded expressing their concerns with the proposed rulemaking. The sheer number of responders helps to demonstrate the important role PEG channels play in Massachusetts. This collective objection to the rulemaking demonstrates that the FCC's actions in this regard would undermine the public interest and harm our communities, local governments, and democratic bedrock.

We strongly urge you to reconsider. We ask you to safeguard the public interest by maintaining the current franchise fee structure and honoring the authority of the cities and towns to control their public rights of way.

Sincerely,  
Westwood Media Center Board of Directors